

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED
STATES VIRGIN ISLANDS,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant/Third-Party
Plaintiff.

Case No. 22-cv-10904 (JSR)

JPMORGAN CHASE BANK, N.A.,

Third-Party Plaintiff,

v.

JAMES EDWARD STALEY,

Third-Party Defendant.

**DEFENDANT JPMORGAN CHASE BANK, N.A.'S
MOTION FOR PARTIAL SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56, Defendant JPMorgan Chase Bank, N.A., hereby respectfully requests that the Court enter summary judgment for JPMC and against USVI on Count V (obstruction) and on both Counts with respect to USVI's demands for monetary relief. In the alternative, summary judgment should enter on Count V (obstruction) with respect to any alleged pre-December 2008 alleged conduct, and on Count I insofar as USVI alleges that JPMC acted with reckless disregard rather than with actual knowledge of a sex trafficking venture prior to December 2008. The reasons in support of Defendant's Motion are set forth in the attached Memorandum of Law and Local Rule 56.1 Statement of Undisputed Material Facts.

Dated: July 24, 2023

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Respectfully submitted,

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